

EXHIBIT K

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In the Matter of
STATE OF WASHINGTON

VS

THE GEO GROUP, INC.

WILLIAM A. MCHATTON

02/01/2019



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WILLIAM A. MCHATTON; February 01, 2019

1

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON

3
4 STATE OF WASHINGTON,)
5 PLAINTIFF,) NO. 3:17-CV-05806-RJB
6 VS.)
7 THE GEO GROUP, INC.,)
8 DEFENDANT.)
9)
10)

11
12 DEPOSITION UPON ORAL EXAMINATION OF
13 WILLIAM A. MCHATTON
14

15 10:00 A.M.

16 FEBRUARY 1, 2019

17 800 FIFTH AVENUE, SUITE 2000

18 SEATTLE, WASHINGTON



24 REPORTED BY: BETSY E. DECATER, RPR, CCR 3109
25



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1 SEATTLE, WASHINGTON; JANUARY 31, 2019

2 10:00 A.M.

3 --oOo--

4
5 WILLIAM A. MCHATTON,

6 sworn as a witness by the Certified Court Reporter,

7 testified as follows:

8
9 EXAMINATION

10 BY MS. BAKER:

11 Q. Good morning, Mr. McHatton. My name is La Rond
12 Baker, as you know, and I'm an assistant attorney
13 general for the State of Washington and counsel on this
14 matter. Next to me is Marsha Chien, who's also an
15 attorney on this case, and later on you will likely meet
16 Andrea Brenneke who is another attorney on the case.
17 She may come down.

18 Will you please state your full name and address
19 for the record?

20 A. William A. McHatton. My address, physical or
21 mailing?

22 Q. Mailing is fine.

23 A. P.O. Box 1968 Eatonville, Washington 98328.

24 (Off the record.)

25 Q. (BY MS. BAKER) Have you been deposed before?



1 A. Yeah. It was the guy who replaced me, Bruce
2 Scott.

3 Q. And was there a previous chief of security before
4 Bruce Scott?

5 A. Yes.

6 Q. If you don't recall, that's okay, but I will --

7 A. Jaramillo, J-a-r-a-m-i-l-l-o.

8 Q. Do you know how long Bruce Scott was in that
9 position?

10 A. I would prefer not to guess.

11 Q. Okay. So as associate warden, did you have
12 responsibility for ensuring that GEO officers supervised
13 detainee workers in the voluntary work program?

14 A. The way I heard your question is did I have
15 supervision responsibility over the officers who --
16 dotted line. Direct would come from the chief and
17 captain and the lieutenant, chief lieutenant.

18 Q. Did you develop training for the GEO officers
19 that oversaw the detainee workers in the voluntary work
20 program?

21 A. I believe that's included within the academy.

22 Q. Can you tell me what that means?

23 A. What I just said?

24 Q. That's correct.

25 A. Before and into the -- before an individual



1 officer is placed on the job, he or she must complete I
2 believe it to be approximately six-weeks training
3 academy, plus I think it's two weeks on-the-job training
4 before he or she is assigned a shift and a post, et
5 cetera.

6 Q. And it's your understanding that supervising
7 detainee workers is part of the training that GEO
8 officers receive in the academy?

9 A. I believe it is.

10 Q. Do you know if there are particular policies or
11 documents that GEO guards would receive as part of their
12 training regarding supervising detainee workers in the
13 voluntary work program?

14 A. My recollection of the way it was originally in
15 the compliance is that, for example, Alisha Singleton or
16 Michael Heye, they have been pretty much -- Alisha was
17 the original classification officer, and then I guess
18 Michael Heye was added to that role. And so Alicia was
19 lead.

20 And so either one of those two would conduct a
21 class as part of the academy, and they would use the NDS
22 or the PBNDS or our own policies. They handed out one
23 or both.

24 Q. And so when you say they would use your own
25 policies --



1 like a detainee worker who did paint in the facility for
2 The GEO Group, can you tell me what they did, what
3 training there might have been for that position?

4 A. The -- no, not without -- I wouldn't be
5 comfortable answering that.

6 Q. Did detainee workers paint outside of the living
7 areas, so the hallways in the facility or the kitchen
8 area in the facility?

9 A. The hallways per se were maintained by the
10 maintenance department. We had a voluntary work program
11 assignment in the hallways of -- have you been there?

12 Q. Uh-huh.

13 A. Have you seen the artwork that's on many of the
14 walls?

15 Q. Actually, I've only been in the attorney rooms.
16 I've not actually been inside. Marsha has.

17 A. Marsha has, is that what you said?

18 (Off the record.)

19 Q. (BY MS. BAKER) So you were talking about the
20 hallways and maintaining the hallways?

21 A. Maintaining the hallways is conducted by the
22 maintenance department.

23 Q. And the maintenance department, are those
24 detainee workers?

25 A. No. That was GEO staff.



1 Q. So detainee workers would not paint the walls of
2 the hallway; is that correct?

3 A. There's artwork on the walls of the hallways
4 within the facility.

5 Q. That detainee workers painted?

6 A. Created.

7 Q. Created.

8 So in terms of earlier, and I'm just trying to
9 understand sort of how painting the -- how the painting
10 detail works, earlier you indicated that detainee
11 workers will sometimes paint inside of the living units?

12 Are there ever times where detainee workers paint
13 outside of their living units?

14 A. Not to my recollection.

15 Q. So detainee workers --

16 A. Would you rephrase the question, please, or ask
17 it again?

18 Q. So earlier you indicated that detainee workers
19 will paint inside of their housing units.

20 Do detainee workers ever paint, not murals, not
21 artwork, but do painting outside of their living units?

22 A. I do not recall that they did.

23 Q. Do you know whether or not detainee workers would
24 paint the attorney-client -- the attorney meeting rooms?

25 A. The attorney-client rooms?



1 to ensure that personal hygiene requirements are met
2 within the facility; is that correct?

3 MR. PUSATERI: Object to form.

4 A. Again, just like food service, if there weren't
5 any detainee workers, we would still have to do this
6 job.

7 Q. If there were no detainee workers in the laundry,
8 how would you meet the standard?

9 A. Assign additional staff to it.

10 Q. So there would be more GEO employees that would
11 have to be hired to be able to meet the standard?

12 A. Probably not.

13 Q. Can you tell me then what would happen?

14 A. There's utility positions.

15 Q. I don't know what that means.

16 A. That's left over from old DOC days. Extra posts,
17 extra people on staff, in accordance with the staffing
18 plan that can be pulled off of and placed where they're
19 needed.

20 Q. And would that individual GEO employee be paid
21 more than a dollar per day for their labor in the
22 laundry?

23 A. Yes.

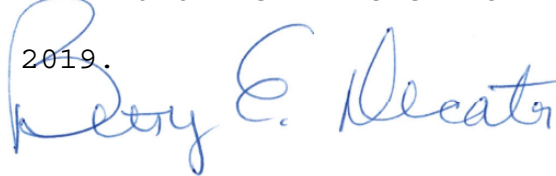
24 Q. Would you also authorize overtime, if necessary,
25 in order to meet the obligations under the PBNDS



REPORTER'S CERTIFICATE

I, BETSY E. DECATER, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn to testify to the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that a review of which was reserved; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND and DIGITAL SIGNATURE this 13th day of February, 2019.



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